

AFFIDAVIT OF SEAN GARNETT

Comes the undersigned, Sean Garnett, and after first being duly sworn, states as follows:

1. I am the President and sole owner of Shadowsand, Inc..
 2. MEC, Ltd. employed Shadowsand Inc. to create an electronics board according to their functional specifications to serve as an electronic actuator for several prototypes of an electromechanical safety/locking system for a firearm.
 3. In June 1997, MEC created and built functional prototypes of two different designs of an electromechanical safety/locking system for a firearm. One was designated as the "trigger block" design, and the other was designated as the "trigger bar pulldown" design. Initially, I connected both prototypes up to an on/off box switch run by batteries, and connected to the prototypes by an external cable. I was present in June 1997 when both of these prototypes were test fired and videotaped.
 4. In July and August 1997, I created and built an electronics board that demonstrated how the trigger block prototype would function in its marketing version with a keypad actuator. The functional specifications for the keypad performance were given to me by MEC. The prototype was connected to the board by means of an external cable. I wrote the "Instructions for Operation" that went with the board. This prototype and board was used for the demonstration to the SIG Board of Directors.
 5. In November and December at MEC's request, I arranged for the production of the miniaturized version of the electronics. On 11/20/97 through the vendor, *Your Electronics Source* as the manufacturer's representative of *AGASIS*, a California company, I ordered the necessary miniaturized circuit boards for the marketing prototype of the trigger block design.
- Copies of the job quotation, job order, and order confirmation from *Your Electronics Source* are attached hereto at **Exhibit 1**, along with the supporting invoice and customer approval form from *AGASIS*.

Exhibit 18

6. Those boards were delivered on November 27, 1997.

7. MEC, in July 1997 at my request, had previously ordered some additional motors and gearheads needed for the marketing prototypes from *MicroMo Electronics, Inc.*

A copy of the invoice for those motors and gearheads from *MicroMo Electronics, Inc.* is attached hereto at **Exhibit 2**.

8. On October 11, 1997 I detailed some preliminary manufacturing specifications for the keypad.

A copy of those preliminary specifications is attached hereto at **Exhibit 3**.

9. I ordered some additional component parts that would be used in populating the miniaturized circuit boards from *Digi-Key Corporation* on 11/21/97.

A copy of that *Digi-Key Corporation* invoice is attached hereto at **Exhibit 4**.

10. I proceeded to build several completed and populated circuit boards.

11. MEC had finalized the keypad specification and furnished same to *Elite Sales & Technology Ltd.*, a North Carolina company with production capabilities in Taiwan, for the manufacturing requirement.

A copy of that specification dated 11/24 is attached hereto at **Exhibit 5**.

12. The marketing prototype, a SIG 239 handgun with the trigger built up and drilled, the frame modified, the motor, gear, and spring-loaded pin in position, and the protective box machined and attached, was delivered to me by MEC in mid December 1997. I embedded the electronics, lacking only the keypad to complete the marketing prototype.

13. Shortly after Christmas 1997, MEC supplied me with the keypad obtained through *Elite Sales & Technology Ltd.*

A copy of *Elite's* order form dated 11/28/97, and subsequent invoice showing the Fed Ex shipping on 12/23/97 are attached hereto at **Exhibit 6**.

14. I immediately completed assembling the marketing prototype. We tested the marketing prototype and it worked fine.

This was the same marketing prototype that MEC took with them to the Shot Show on January 25, 1998, and the same marketing prototype that was later tested by the Kentucky State Police.

The electromechanical design configuration of the marketing prototype was the same as that used in the functional prototype, the difference between the two prototypes being that the electronics and power supply were external on the functional prototype, and miniaturized and integrated into the marketing prototype.

Further the affiant saith not.


Sean Garnett

Commonwealth of Kentucky
County of Fayette

Subscribed, sworn to, and acknowledged before me by Sean Garnett on this the 8th day of July 2003.

My Commission Expires: 3-6-2006


Notary Public, State of Kentucky